

31 January 2022

## WHAT IS THE GAS MASTER PLAN?

South Africa's Department of Mineral Resources and Energy (DMRE) released the [Gas Master Plan Base Case Report](#) for public comment on Tuesday, 14 December 2021. Its purpose is to establish baseline information for South Africa's natural gas development, as well as to outline the Gas Master Plan roadmap. The baseline information includes an overview of the gas value chain, as well as regulatory framework. The Gas Master Plan will serve as a policy instrument and guide industry investment, planning and coordinated implementation regarding gas.

## NATURAL JUSTICE COMMENTS: THEMES AND SUMMARY

### TIMING OF PUBLICATION OF THE GAS MASTER PLAN

The timing of the publication of this plan for public comment, on 14 December 2021, when year-end holidays were about to begin, and duration of commenting period (all comments required by 31 January 2022\*) do not allow for adequate time to properly analyse the 100-page document. It may indicate bad faith on the part of the Department of Mineral Resources and Energy.

*\*this deadline was extended, but the extension only announced in the media on 1 February 2022*

### FUGITIVE GAS EMISSIONS

Methane emissions from gas mining have been linked to an increase in greenhouse gas (GHG) emissions. Methane is the main greenhouse gas after carbon dioxide. As a result, this sector is not as clean or carbon neutral as proclaimed.

### FINANCIAL IMPLICATIONS

The gas sector will have a huge financial implication on South Africa's budget, since most of this infrastructure expansion will be new. Although the projects might add to the economy, their environmental and social costs often outweigh their benefits. Furthermore, the economic benefits are unlikely to benefit the majority of poor and low income citizens.

### WHAT ABOUT CLIMATE COMMITMENTS?

Gas investment and development contradicts South Africa's Climate Change Bill, and undermines the urgency of a Just Energy Transition and the [Global Methane Pledge](#) adopted at COP26.

### INFRASTRUCTURE DEVELOPMENT

Many concerns arise, including how the infrastructure needed to transport and store gas will be financed; and how communities will be compensated when land/ property needs to be expropriated to build pipelines.

### DEPENDENCY ON FOSSIL FUELS

The development of gas in South Africa will perpetuate our fossil fuel dependence and slow a just energy transition.

### WHAT ABOUT NEMA?

The Gas Master Plan fails to reference the National Environmental Management Act (NEMA) regarding certain provisions. It is important that the Gas Master Plan speaks to NEMA due to the impact of gas and gas pipelines on the environment.

### JUST ENERGY TRANSITION

Gas development is not compatible with a just, fair, equitable and decarbonised energy future in South Africa, where people are able to contribute to and benefit from the means of energy production and distribution.

### PUBLIC PARTICIPATION

The Gas Master Plan should have additional processes for public participation, including those outlined in NEMA or the Environmental Impact Assessment regulations.

### FREE, PRIOR AND INFORMED CONSENT

We urge provision for the internationally accepted principle of free, prior and informed consent (FPIC) for public engagement in gas, which is more empowering and leads to greater realisation of human rights.

### WHAT IS "NATIONAL INTEREST"?

Natural Justice is concerned that the undefined use of the phrase "national interest" could be used to justify the licensing of certain gas infrastructure that may not be in South Africa's best interests. A definition must be included.

### ROLE OF ENERGY REGULATOR

It is unclear what procedure the Energy Regulator will use when required to publish the criteria outlined in Section 19. (2) of the Gas Amendment Bill, regarding licensing of gas. The Gas Master Plan, as a policy document, should have explained this further.

### EXPROPRIATION OF PROPERTY

The Gas Master Plan does not speak to how families and communities will be compensated in cases of land expropriation for pipeline expansion, especially when families might be vulnerable.

### RISKS

The Gas Master Plan proposes many possibilities of which there are risks. We are concerned that plans to overcome risks (such as such as affordability, price fluctuations and changing exchange rates) are not outlined. It also does not mention what might happen with regards to incidences of gas explosions, which may negatively effect communities and workers.

### INADEQUATE TIME ALLOCATIONS

There is no provision for consultation, notification, or public participation in relation to applications to develop gas. Currently, the timeframes within which the Energy Regulator receives the application and objections to the gas development do not provide opportunities for consultation processes.